

M. Premo-Hopkins Reply Decl. Exhibit 4

From: Premo-Hopkins, Mark W.
Sent: Thursday, August 21, 2025 10:07 AM
To: Roopal Luhana
Cc: Vartain, Laura; Sarah London; Rachel Abrams; Andrew Kaufman; Steven Cohn; Larsen, Beth; Davidson, Jessica
Subject: RE: Uber's Motion For Enforcement of the Protective Order

Thanks, Roopal. Here is a proposed alternative with some minor changes.

We maintain that we will ultimately need to obtain certifications from all counsel on the plaintiffs' side that had access to the materials.

I can be available to discuss starting at 3:30 PT / 6:30 ET today. If that times works, can you please circulate an invite?

*****UBER DRAFT*****

- Each PSC law firm with access to MDL shared document and work product depositories will conduct an investigation and report to Uber's counsel by email the following:
 - o I contacted each employee, contractor, consultant or agent (including expert witnesses) working with [INSERT FIRM NAME HERE], as well as any client who, to best of my knowledge and based on a reasonable investigation, had access to the compilation of sealed documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs' summary judgment opposition in the JCCP. Each of the individuals confirmed to me they did not share or in any way provide access, directly or indirectly, to any of the documents referenced in the Article to the New York Times or its agents, either directly or indirectly. I did not contact consultants, contractors, agents, or experts that I knew were contacted by another law firm.
 - o ~~I do not have information suggesting that that any individual identified in paragraph 1 shared or in any way provided access, directly or indirectly, to any of the documents referenced in the Article to the New York Times or its agents, either directly or indirectly.~~
I do not have any knowledge or information relating to the identity of any person, entity or organization that was involved in any way - either directly or indirectly - in sharing confidential information with the New York Times.

OR

- o The investigation described in paragraph 1 revealed information concerning the source of this unauthorized disclosure to the New York Times and then describe the circumstances of such disclosure.
- Reports to Uber's counsel at [email address] are due by [insert reasonable date].

Mark Premo-Hopkins, P.C.

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From: Roopal Luhana <Luhana@chaffinluhana.com>
Sent: Wednesday, August 20, 2025 12:14 PM
To: Premo-Hopkins, Mark W. <mark.premohopkins@kirkland.com>
Cc: Vartain, Laura <laura.vartain@kirkland.com>; Sarah London <slondon@girardsharp.com>; Rachel Abrams <rabrams@peifferwolf.com>; Andrew Kaufman <akaufman@girardsharp.com>; Steven Cohn <cohn@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: Re: Uber's Motion For Enforcement of the Protective Order

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Be cautious, particularly with links and attachments.

Thank you for your e-mail Mark. I'm available for a call tomorrow to discuss the matter further. However, as I mentioned to Laura yesterday and noted in my emails last week, we should have met and conferred before the Defendants filed the Motion to Enforce the Protective Order. We believe the Defendants should withdraw their Motion since the proper meeting and conferring process was not followed.

To address your concerns, MDL Leadership is willing to agree to the following:

- Each PSC law firm with access to MDL shared document and work product depositories will conduct an investigation and report to Uber's counsel by email the following:
 - o I contacted each employee, contractor, consultant or agent (including expert witnesses) working with [INSERT FIRM NAME HERE], as well as any client who, to best of my knowledge and based on a reasonable investigation, had access to the compilation of sealed documents/exhibits (or a significant subset thereof) submitted in connection with Plaintiffs' summary judgment opposition in the JCCP. I did not contact consultants, contractors, agents, or experts that I knew were contacted by another law firm.
 - o Following reasonable investigation, I do not have information suggesting that that any individual identified in paragraph 1 shared or in any way provided access, directly or indirectly, to any of the documents referenced in the Article to the New York Times or its agents, either directly or indirectly.

OR

- o The investigation described in paragraph 1 revealed information concerning the source of this unauthorized disclosure to the New York Times and then describe the circumstances of such disclosure.
- Reports to Uber's counsel at [email address] are due by [insert reasonable date].

We believe this proposal adequately addresses the concerns raised.

Best,
Roopal

Roopal Luhana | Partner

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A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

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From: Premo-Hopkins, Mark W. <mark.premohopkins@kirkland.com>

Sent: Tuesday, August 19, 2025 4:07 PM

To: Roopal Luhana <Luhana@chaffinluhana.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Vartain, Laura <laura.vartain@kirkland.com>

Subject: Re: Uber's Motion For Enforcement of the Protective Order

Roopal - apologies for the delay in getting back to you. I was traveling internationally for work and did not get a chance to circle back.

I am happy to connect to discuss. I understand from Laura Vartain that you have a proposal for what plaintiffs' leadership counsel would be willing to do. Please send that along in advance.

Copying Laura here for visibility.

Are you available to discuss tomorrow or Thursday?

Mark Premo-Hopkins, P.C.

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On Aug 14, 2025, at 6:28 PM, Roopal Luhana <Luhana@chaffinluhana.com> wrote:

Hi Mark, I left you a VM on your cell and work line today to discuss above. Can you please give me a call when you get a chance? Thanks.

Best,
Roopal

Roopal Luhana | Partner

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